

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) MICHAEL DELANEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:21-cv-00544-GAG-SH
)	
(1) CITY OF TULSA, OKLAHOMA,)	
(2) AARON RUSSELL,)	
)	
Defendants.)	

JOINT MOTION TO ENTER AGREED JUDGMENT

Plaintiff Michael Delaney and Defendant City of Tulsa, pursuant to Fed. R. Civ. P. 58, respectfully request this Court enter the Agreed Judgment submitted separately by the parties.

The Parties have reached a settlement of this lawsuit. Pursuant to 62 O.S. § 362, in order for Defendant City of Tulsa to pay settlement proceeds from the City of Tulsa's sinking fund, the City must first have an Agreed Judgment signed by the Parties and approved by the Court.

The Parties have agreed on the language of an Agreed Judgment, which has been separately submitted for this Court's review.

WHEREFORE, the Parties respectfully request that this Court approve and enter the Agreed Judgment separately submitted.

Respectfully submitted,

/s/Bryon D. Helm

Daniel E. Smolen, OBA #19943

Robert Blakemore, OBA #18656

Bryon D. Helm, OBA #33003

SMOLEN & ROYTMAN

701 S. Cincinnati Ave.

Tulsa, Oklahoma 74119

P: (918) 585-2667

F: (918) 585-2669

ATTORNEYS FOR PLAINTIFF

/s/R. Lawson Vaughn

R. Lawson Vaughn, OBA # 21557

T. Michelle McGrew, OBA # 20279

Senior Assistant City Attorneys

175 E. Second Street, Suite 685

Tulsa, OK 74103

(918) 596-7717 Telephone

(918) 596-9700 Facsimile

lvaughn@cityoftulsa.org

mmcgrew@cityoftulsa.org

ATTORNEYS FOR DEFENDANT